

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KNIFE RIGHTS, INC. et al. Plaintiffs,  v.  CITY OF PHILADELPHIA, et al. Defendants.	Civil Action No. 2:23-cv-01758-GAM
<b>NOTICE OF ACCEPTANCE</b>	

To Anne B. Taylor:

Under Fed. R. Civ. P. 68(a), this Notice of Acceptance memorializes Plaintiffs' acceptance of the City's June 5, 2023 Offer of Judgment to one of Plaintiffs' claims in the above captioned case. Plaintiffs' counsel accepted Defendants' offer in writing on June 19, 2023. Further, Counsel for Plaintiffs advised Defendants' Counsel that their Rule 68 Offer of Judgment did not address all the claims presented in Plaintiffs' Complaint. (ECF No. 1). Plaintiffs await a response from Defendants as to whether Defendants plan to defend the remaining claims in Plaintiffs' Complaint. Attached hereto as **Exhibit A** is a true and correct copy of Defendants' offer. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiffs' acceptance.

June 29, 2023

Respectfully Submitted,



John W. Dillon (SBN: 296788)

Attorney for Plaintiffs

Dillon Law Group APC

2647 Gateway Road

Suite 105, No. 255

Carlsbad, CA 92009

[jdillon@dillonlawgp.com](mailto:jdillon@dillonlawgp.com)

### **CERTIFICATE OF SERVICE**

I certify that on the date set forth below, I filed a copy of the foregoing paper via the Court's CM/ECF System, which provide notice to all counsel as Filing Users. The document is available for viewing and downloading from the ECF system.

June 29, 2023



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John W. Dillon (SBN: 296788)

Attorney for Plaintiffs

Dillon Law Group APC

2647 Gateway Road

Suite 105, No. 255

Carlsbad, CA 92009

[jdillon@dillonlawgp.com](mailto:jdillon@dillonlawgp.com)

# **EXHIBIT A**



**CITY OF PHILADELPHIA**

LAW DEPARTMENT  
One Parkway  
1515 Arch Street  
Philadelphia, PA 19102-1595

Anne B. Taylor, Esq.  
Chief Deputy City Solicitor  
Civil Rights Unit  
Phone: 215-683-5381  
anne.taylor@phila.gov

June 5, 2023

**Via Electronic Mail**

William Sack  
FIREARMS POLICY COALITION  
5550 Painted Mirage, Suite 320  
Las Vegas, NV 89149  
wsack@fpclaw.org

John W. Dillon  
DILLON LAW GROUP APC  
2647 Gateway Road  
Suite 105, No. 255  
Carlsbad, California 92009  
jdillon@dillonlawgp.com

**Re: *Knife Rights, Inc., et al. v. City of Philadelphia, et al.*, No. 2:23-cv-01758-GAM**

Dear Messrs. Sack and Dillon:

Enclosed, please find a Rule 68 Offer of Judgment in the above-referenced matter. This Offer will expire in fourteen (14) days if no written response is received.

Very truly yours,

/s/ Anne B. Taylor  
Anne B. Taylor, Esq.  
Counsel for Defendant

w/ encl.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>KNIFE RIGHTS, INC., et al.</b>	:	
<b>Plaintiffs,</b>	:	
	:	
<b>v.</b>	:	<b>Civil Action</b>
	:	<b>No. 2:23-cv-01758-GAM</b>
	:	
<b>CITY OF PHILADELPHIA, et al.,</b>	:	
<b>Defendants.</b>	:	

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**OFFER OF JUDGMENT**

**TO:** William Sack, Esq.  
John W. Dillon, Esq.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Philadelphia hereby offers to allow Judgment to be taken against it and in favor of the Plaintiff for the claim of injunctive relief regarding the ordinance currently codified at Philadelphia Code 10-820, brought by way of the instant litigation, inclusive of costs, attorneys' fees, and interest accrued to date, in the amount of Ten Thousand Dollars (\$10,000.00).

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed either as an admission that any Defendant is liable in this action, or that Plaintiff has suffered any damages. Said judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible as evidence in any proceeding, except, if rejected, in a proceeding to determine costs. If this Offer of Judgment is not accepted in writing within fourteen (14) days, it shall be deemed withdrawn.

Date: June 5, 2023

/s/ Anne B. Taylor  
Anne B. Taylor, Esq.  
Chief Deputy City Solicitor  
City of Philadelphia Law Department  
Civil Rights Unit  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
anne.taylor@phila.gov  
(215) 683-5381

## **EXHIBIT B**



John Dillon &lt;jdillon@dillonlawgp.com&gt;

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**Knife Rights Inc., et al. v. City of Philadelphia et al. - Rule 68 Offer**

1 message

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**John Dillon** <jdillon@dillonlawgp.com>  
To: Anne Taylor <Anne.Taylor@phila.gov>

Mon, Jun 19, 2023 at 1:11 PM

Anne:

I am following up again on the City's Rule 68 offer of judgment. As we previously discussed, the City's offer did not encompass the entirety of Plaintiffs' claims and the City was considering our inquiry to include the remaining claim in its offer. As a part of our ongoing settlement discussions, Plaintiffs will accept the City's offer to allow judgment to be taken against it and in favor of Plaintiffs for the claim of injunctive relief regarding the ordinance currently codified at Philadelphia Code 10-820, inclusive of costs, attorneys' fees, and interest accrued to date, in the amount of ten thousand dollars (\$10,000.00).

However, as previously noted, Plaintiffs are waiting to hear back regarding the remaining claims not addressed in Defendants' original offer. While you stated you would be able to speak on this issue last week, I have not heard back from you and was made aware that you are on vacation until June 20, 2023. As such, I assume that the City's 14-day response deadline will be extended so that we may finish our ongoing settlement discussions.

Please confirm receipt.

Thanks,

- John

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*John W. Dillon*

760.642.7150

Dillonlawgp.com



*For updates and news on California firearms laws and regulations, listen to me on “**Gun Sports Radio**” every Sunday on **AM 1170 The Answer - KCBQ***

**NOTICE:** This communication and any attached document(s) are privileged and confidential. In addition, any disclosure of this transmission does not compromise or waive the attorney-client privilege or the work product doctrine. If you have received this communication in error, please delete it and contact me at [jdillon@dillonlawgp.com](mailto:jdillon@dillonlawgp.com)